# IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WILLIE BROWN,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 08 CV 1577
	)	
VILLAGE OF ROMEOVILLE, et al.,	)	Judge Holderman
	)	Magistrate Judge Ashman
Defendants.	)	-

# DEFENDANTS' MOTION FOR EXTENSION OF TIME IN WHICH TO FILE RESPONSIVE PLEADINGS

NOW COME the Defendants, VILLAGE OF ROMEOVILLE, DANIEL ZAKULA,

JAMES SLOUP and KARYN SHOWERS, by and through one of their attorneys, MICHAEL D.

BERSANI of HERVAS, CONDON & BERSANI, P.C., and, move this Honorable Court for the
entry of an order granting Defendants an enlargement of time through and including May 23,

2008 in which to answer or otherwise plead to Plaintiff's complaint.

In support of said motion, Defendants state the following unto this Honorable Court:

- 1. On March 18, 2008, Plaintiff appearing *pro se* filed this civil rights complaint against Defendants.
- 2. Plaintiff sent the summons and complaint to the Defendants by certified mail on March 24, 2008.
- 3. The law firm of Hervas, Condon & Bersani, P.C. was recently retained by Defendants to provide legal representation for the Defendants.
- 4. The undersigned entered appearances on behalf of the Defendants on April 23, 2008.

- 5. Since receiving Plaintiff's complaint, Defendants' attorneys have been investigating the allegations in Plaintiff's complaint.
- 6. Defendants request an enlargement of time through and including May 23, 2008 in which to file their responsive pleadings to Plaintiff's complaint.
- 7. The delay in responding to Plaintiff's complaint is in no way designed to prejudice or inconvenience any party to this action.
- 8. That no harm or prejudice will inure to any party to this action as the result of the granting of this motion.

WHEREFORE, the Defendants, VILLAGE OF ROMOEVILLE, DANIEL ZAKULA,

JAMES SLOUP and KARYN SHOWERS, pray this Honorable Court will grant their motion for
an enlargement of time through and including May 23, 2008 in which to file responsive
pleadings.

#### s/MICHAEL D. BERSANI

Michael D. Bersani, Bar Number 06200897 Attorney for Defendants HERVAS, CONDON & BERSANI, P.C. 333 Pierce Road, Suite 195 Itasca, IL 60143-3156

Phone: 630-773-4774 Fax: 630-773-4851

mbersani@hcbattorneys.com

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### **CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2008, I electronically filed the foregoing *Defendants' Motion for Extension of Time in Which to File Responsive Pleadings* with the Clerk of the Court using the CM/ECF system, and that I have mailed by United States Postal Service, certified mail, return receipt requested, the document to the following non CM/ECF system participant:

Willie Brown, *Pro Se* 601 Theodore Avenue Joliet, IL 60435

#### s/MICHAEL D. BERSANI

Michael D. Bersani, Bar Number 06200897 Attorney for Defendants HERVAS, CONDON & BERSANI, P.C. 333 Pierce Road, Suite 195 Itasca, IL 60143-3156

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